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April 29, 2021

Via ECF

Hon. John P. Cronan, Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Jennifer Barrios and Luz Mary Barrios v. Miguel
Bello and Mayalyn Ines Negron
20-CV-05228 (JPC)

Your Honor:

We are counsel for the plaintiffs Jennifer Barrios and
Luz Mary Barrios in the above referenced matter.

By this letter, the parties respectfully apply for a
forty-five (45) day extension of the discovery schedule set
forth in this Court's November 18, 2020 Civil Case Management
Plan and Scheduling Order (Document No. 22). The parties have
engaged in discovery since said order, and there remains only
the completion of certain depositions and limited expert
discovery. A forty-five (45) day extension of the final
discovery deadline set forth in the scheduling order would allow
the parties until June 17, 2021 to produce the remaining
individuals for deposition, and finalize all remaining expert
discovery. If the Court grants this application, the parties
also respectfully request that the May 4, 2021 conference in
this action be adjourned to a date after discovery is to be
completed.

Letter Hon. John P. Cronan, Judge
April 29, 2021
Page 2

This is the parties' first application for an extension of time to complete discovery. This application is made with the consent of counsel for all parties to this action.

Respectfully submitted,

/s/

Jeffrey Weiskopf

cc: Via ECF
Michael K. Gertzer, Esq.
Magda DeMoya Coyle, Esq.
Susan Duncan, Esq.

The parties' request is granted. All discovery is to be completed by June 17, 2021.

The Pretrial Conference scheduled for May 4, 2021, at 10:00 a.m. is adjourned to June 23, 2021, at 11:30 a.m.

SO ORDERED.

Date: April 29, 2021
New York, New York


JOHN P. CRONAN
United States District Judge